

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

IN RE:

SD-Charlotte, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-30149

MOTION FOR *PRO HAC VICE* ADMISSION FOR TODD M. GARDELLA

A. Cotten Wright, hereby moves the Court for entry of an Order pursuant to Local Bankruptcy Rule 2090-2 for the admission *pro hac vice* of Todd M. Gardella to this Court for the purpose of representing Bridge Funding Group, Inc. in the above-referenced chapter 11 bankruptcy cases and any related adversary proceedings, and, in support thereof, respectfully shows the Court as follows:

1. The undersigned is a member of the bar of this Court in good standing and is a member of the firm of Grier Wright Martinez, PA located at 521 E. Morehead Street, Suite 440, Charlotte, NC 28202.

2. Todd M. Gardella (“Mr. Gardella”) seeks to appear *pro hac vice* on behalf of Bridge Funding Group, Inc. in these chapter 11 cases and any related adversary proceedings. Mr. Gardella is a partner at the law firm of Lazer, Aptheker, Rosella & Yedid, P.C. (the “Lazer Firm”) and maintains an office at 225 Old Country Road Melville, NY 11747. Mr. Gardella’s telephone number is 631-761-0819, and his email address is gardella@larypc.com.

3. The Lazer Firm is employed as bankruptcy counsel to Bridge Funding Group, Inc. in connection with these chapter 11 cases.

¹ The Debtors in the following cases have requested that their cases be jointly administered: SD-Charlotte, LLC, Case No. 20-30149; RTHT Investments, LLC, Case No. 20-30152; SD Restaurant Group, LLC, Case No. 20-30154; SD-Missouri, LLC, Case No. 20-30150; and Southern Deli Holdings, LLC, Case No. 20-30151.

4. Mr. Gardella is admitted to the State Bar of New York.

5. Mr. Gardella is familiar with the Federal Rules of Civil Procedure and the Federal Rules of Bankruptcy Procedure, has been made aware of the Local Rules of Bankruptcy Procedure published by this Court, and understands that he will be subject to the disciplinary jurisdiction of this Court.

6. The undersigned counsel serves as co-counsel in this case, and any related adversary proceedings, and will attend all hearings with the proposed admittee unless otherwise permitted by the Court.

7. A Declaration of Mr. Gardella in support of this application is attached.

8. The \$281.00 fee for *pro hac vice* admission will be tendered upon the filing of this application.

WHEREFORE, the undersigned respectfully prays that the Court will enter an Order admitting Mr. Gardella *pro hac vice* in these matters.

This 10th day of February, 2020.

/s/ A. Cotten Wright

A. Cotten Wright (State Bar No. 28162)

Grier Wright Martinez, PA

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**DECLARATION OF TODD M. GARDELLA IN SUPPORT OF
APPLICATION FOR ADMISSION *PRO HAC VICE***

Todd M. Gardella declares as follows:

1. I am a partner of the law firm of Lazer, Aptheker, Rosella & Yedid, P.C. (the “Lazer Firm”). My contact information is:

Lazer, Aptheker, Rosella & Yedid, P.C.
Melville Law Center
225 Old Country Road
Melville, NY 11747
Tel: (631) 761-0819
Fax: 631-761-0709
gardella@larypc.com

2. The Lazer Firm is employed as bankruptcy counsel to Bridge Funding Group, Inc.

3. I am admitted to the State Bar of New York.

4. I am in good standing in all the courts where I have been admitted.

5. I am generally familiar with the Federal Rules of Civil Procedure and the Federal Rules of Bankruptcy Procedure, I have been made aware of the Local Rules of Bankruptcy Procedure published by this Court, and I understand that I will be subject to the disciplinary jurisdiction of this Court.

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6. I have never been disbarred, suspended, or denied admission to practice. I have never had a *pro hac vice* admission revoked or admission in any other bar revoked. No disciplinary proceeding has been initiated against me and no investigation is currently pending.

7. I am not a member of the North Carolina bar and I do not maintain any law office in North Carolina.

8. I understand that my admission *pro hac vice* is for these chapter 11 cases and any related adversary proceedings only and does not constitute formal admission to the bar of this Court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 10th day of February, 2020.

/s/ Todd M. Gardella
Todd M. Gardella